



MARINE MAMMAL COMMISSION

20 April 2016

Ms. Jennifer Jessup
Departmental Paperwork Clearance Officer
Department of Commerce
Room 6616
14th and Constitution Avenue, N.W.
Washington, D.C. 20230

RE: Extension of Information Collection 0648-0387

Dear Ms. Jessup:

The Marine Mammal Commission (the Commission) has reviewed the National Oceanic and Atmospheric Administration's (NOAA) *Federal Register* notice (81 Fed. Reg. 20368) regarding revision of an information collection authorization for implementing the International Dolphin Conservation Program Act (IDCPA), which allows entry of yellowfin tuna into the United States under specific conditions.

The Commission agrees with NOAA's assertion in the notice that the information collected is required to meet NOAA's obligations under the IDCPA. In particular, the data provided under this program allow NOAA's National Marine Fisheries Service (NMFS) to ensure that tuna imported into the United States can appropriately be labeled "dolphin-safe" under the U.S. regulations that implement the Marine Mammal Protection Act (MMPA)

The Commission agrees that the proposed collection of information is necessary for the proper performance of agency responsibilities under its MMPA. The Commission also supports the use of automated collection techniques or other forms of information technology, not just to minimize the reporting burden, but also to improve the accuracy of data. Finally, the Commission welcomes the efforts underway to incorporate this information collection with the new systems under design for traceability of seafood imports, as noted in the proposed rule of March 23, 2016 (81 Fed. Reg. 1544).

Please contact me if you need additional information to support this proposed information collection.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is fluid and cursive.

Rebecca J. Lent, Ph.D.
Executive Director

cc: Daniel Studt, NOAA